

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

<i>In the Matter of</i>)	
)	
Amendment of Part 2 of the Commission's)	
Rules to Allocate Spectrum Below 3 GHz for)	
Mobile and Fixed Services to Support the)	ET Docket No. 00-258 /
Introduction of New Advanced Wireless)	
Services, including Third Generation Wireless)	
Systems)	
)	
Petition for Rulemaking of the Cellular)	
Telecommunications Industry Association)	
Concerning Implementation of WRC-2000:)	RM-9920
Review of Spectrum and Regulatory)	
Requirements for IMT-2000)	
)	
Amendment of the U.S. Table of Frequency)	
Allocations to Designate the 2500-)	RM-9911
2520/2670-2690 MHz Frequency Bands for)	
the Mobile-Satellite Service)	

COMMENTS OF THE SDR FORUM

The Software Defined Radio ("SDR") Forum is an open, non-profit corporation dedicated to supporting the development and deployment of flexible, adaptable wireless systems based on SDR technology. SDR is a combination of hardware and software technologies that allow the development and deployment of wireless networks, base stations, and user terminals that can operate across a range of existing services, and can adapt to support new services as they are developed. The SDR Forum supports the Commission's efforts to support third generation ("3G") mobile systems, and commends the Commission for issuing this *Notice*.

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TECHNOLOGY FACTORS AND IMPLICATIONS FOR 3G

The Forum recognizes that the Commission's main objective at this time is to determine the specific frequency bands that will be allocated for 3G systems. This policy choice lies beyond the mission and purpose of the SDR Forum, and we will therefore not comment directly on those aspects of the *Notice*.

Regardless of the bands chosen, however, SDR technologies will progressively assist with the implementation and availability of 3G services. Most directly, SDR will make it easier for radio equipment to accommodate the various IMT-2000 standards that have been adopted in Europe, the U.S., and Japan. SDR technology will also influence future spectrum-allocation demands and decisions in a variety of ways. For example, the early introduction of innovative, SDR-based services and networks may increase the demand for spectrum. Yet other spectrum demands may be eased by SDR's ability to instantaneously reconfigure systems to more efficient standards or to permit greater sharing of lightly used bands.

Many comments and reply comments on file in other proceedings¹ may aid the Commission's consideration of the 3G spectrum issues. In particular, we urge the Commission to consider the SDR Forum's comments regarding the status, benefits, implications, regulatory requirements and other aspects of software defined radio. SDR is a stimulating set of technologies that will eventually speed the cost-effective

¹ See generally *Notice of Inquiry, In re Inquiry Regarding Software Defined Radios*, FCC 00-103, ET Docket No. 00-47 (rel. Mar. 21, 2000); *Notice of Proposed Rulemaking, In re Authorization and Use of Software Defined Radios*, FCC 00-430, ET Docket No. 00-47 (rel. Dec. 8, 2000) (hereinafter "SDR NPRM").

introduction of 3G and other future radio services, particularly with the aid of the proposed SDR definition and "Class III" Permissive Change procedure.²

CONCLUSION

The SDR Forum congratulates the FCC on its resolve to bring 3G services to the marketplace, and stands ready to assist the Commission in whatever way possible to make this effort a success.

Respectfully submitted,

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² See SDR NPRM at ¶¶ 21-29.